

# **Exhibit 1**

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**From:** Pavel, Ashley <apavel@omm.com>  
**Sent:** Wednesday, October 2, 2019 8:02 PM  
**To:** Herring, Angela K.; McKeen, Elizabeth L.  
**Cc:** Lynch, John F.; Kleinhaus, Emil A.; Friedman, Bryce L. (Simpson Thacher & Bartlett LLP); Phillips, Sarah E.; Bassett, Nicholas A. (Paul Hastings LLP); 'Zwillinger, Zachary S.'  
**Subject:** RE: PREPA -- 30(b)(6) Testimony

\*\*\* EXTERNAL EMAIL \*\*\*

Angie-

Thanks for your patience. For the reasons stated in our objections to the 30(b)(6) notice and in our opposition to the Fuel Line Lender's motion to compel, we continue to believe the testimony sought in the Fuel Line Lenders' July 15, 2019 30(b)(6) deposition notice is beyond the scope of the 9019 litigation, as articulated by both Judge Swain and Judge Dein. Accordingly, we will not agree to produce a witness to testify on these topics.

To the extent you intend to renew your motion to compel, we propose that you file a reply brief accompanied by an informative motion referring the Court to the already-filed motion and opposition and asking that the matter be taken under submission. We are available if you would like to discuss.

Best,  
Ashley

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**From:** Herring, Angela K. <AKHerring@wlrk.com>  
**Sent:** Wednesday, October 2, 2019 10:31 AM  
**To:** McKeen, Elizabeth L. <emckeen@omm.com>; Pavel, Ashley <apavel@omm.com>  
**Cc:** Lynch, John F. <JLynch@wlrk.com>; Kleinhaus, Emil A. <EAKleinhaus@WLRK.com>; Friedman, Bryce L. (Simpson Thacher & Bartlett LLP) <bfriedman@stblaw.com>; Phillips, Sarah E. <Sarah.Phillips@stblaw.com>; Bassett, Nicholas A. (Paul Hastings LLP) <nicholasbassett@paulhastings.com>; 'Zwillinger, Zachary S.' <zacharyzwillinger@paulhastings.com>  
**Subject:** RE: PREPA -- 30(b)(6) Testimony

[EXTERNAL MESSAGE]

Liz and Ashley,

I'm writing to follow up on my message below. With the October 11 30(b)(6) deposition fast approaching, we need to know whether you'll be designating Mr. Battle, or some other witness, to provide the requested testimony on the Rate Motion. Please let us know if you'd like to discuss.

Regards,  
Angie

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**From:** Herring, Angela K.  
**Sent:** Monday, September 30, 2019 6:06 PM

To: McKeen, Elizabeth L. <[emckeen@omm.com](mailto:emckeen@omm.com)>; Pavel, Ashley <[apavel@omm.com](mailto:apavel@omm.com)>

Cc: Lynch, John F. <[JLynch@wlrk.com](mailto:JLynch@wlrk.com)>; Kleinhaus, Emil A. <[EAKleinhaus@WLRK.com](mailto:EAKleinhaus@WLRK.com)>; Friedman, Bryce L. (Simpson Thacher & Bartlett LLP) <[bfriedman@stblaw.com](mailto:bfriedman@stblaw.com)>; 'Phillips, Sarah E.' <[Sarah.Phillips@stblaw.com](mailto:Sarah.Phillips@stblaw.com)>; Bassett, Nicholas A. (Paul Hastings LLP) <[nicholasbassett@paulhastings.com](mailto:nicholasbassett@paulhastings.com)>; 'Zwillinger, Zachary S.' <[zacharyzwillinger@paulhastings.com](mailto:zacharyzwillinger@paulhastings.com)>

Subject: PREPA -- 30(b)(6) Testimony

Liz and Ashley,

I'm writing to follow up with respect to discovery relating to the Rate Motion. As you know, we agreed to withdraw our August 2 motion to compel based on our agreement to revisit our July 15 30(b)(6) notice served on PREPA and AAFAF (the "30(b)(6) Notice") following receipt of PREPA and AAFAF's document productions. Based on our review to date, those document productions do not fully answer our basic questions about the rationale for the Rate Motion and the personnel responsible, and we thus hereby renew the 30(b)(6) Notice. Please let us know if you're available to meet and confer.

Regards,

Angie

**Angela K. Herring**

**WACHTELL, LIPTON, ROSEN & KATZ**

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Thank you in advance for your cooperation and assistance.

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